REMARKS

Claims 116-162 are pending in the application.

Claims 116-162 have been rejected.

Rejection of Claims under 35 U.S.C. § 102

Claims 116-163 stand rejected under 35 U.S.C. § 102(b) as purportedly being anticipated by U.S. Patent No. 5,864,842 issued to Pederson et al. ("Pederson"). Applicants respectfully traverse this rejection.

Independent claims 116, 128, 137, 146, and 155 contain features similar to:

> generating a set of SQL statements to query a first table and a second table, wherein
> the generating uses a relationship between the first table and the second table to construct the set of SQL statements, and
> the set of SQL statements comprises SQL statements other than a statement that joins the first and second tables;
> querying the first table using the set of SQL statements to produce a result set;
> querying the second table using the set of SQL statements to produce a second result set; and
> joining the result set and the second result set to produce a third result set.

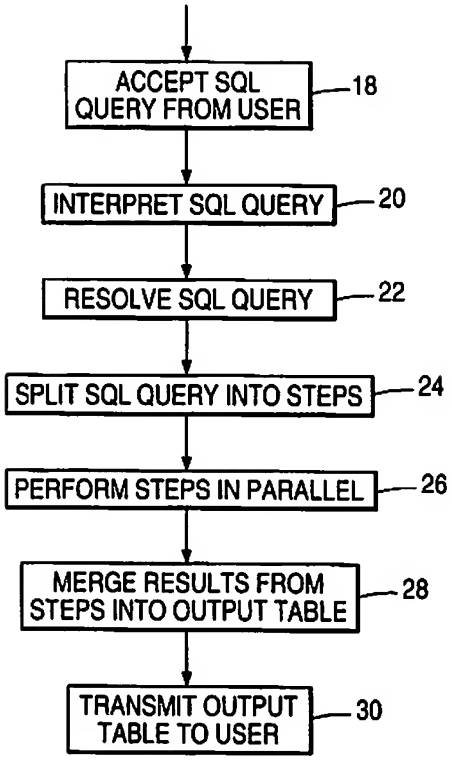
See, e.g., claim 116 (emphasis added). The Office Action cites to a single section of Pederson entitled "Execution of SQL Queries" as purported disclosure of the entirety of claim 116. Applicants submit that the cited passages of Pederson regarding the execution of queries are clearly distinguishable from the claimed invention; at least because Pederson generates SQL queries that perform join operations. By contrast, the claimed method generates SQL statements that do not perform join operations. Because Pederson generates SQL queries that explicitly perform join operations and because the claimed method generates SQL statements that explicitly do not perform join operations, it cannot be said that Pederson teaches or suggests Claim 116.

The cited passage of Pederson in question is as follows:

> Block 18 represents an SQL query being accepted by the IFP node 12. Block 20 represents the SQL query being transformed by an SQL interpreter executing on the IFP node 12. Block 22 represents the SQL interpreter resolving symbolic names in the query using a data dictionary that contains information about all the databases and tables in the system. **Block 24 represents the SQL interpreter splitting the query** into one or more "step messages", wherein each step message is assigned to an AMP node 12 identified by a hash bucket.
>
> As mentioned above, the rows of the tables are evenly distributed among all AMP nodes 12, so that all AMP nodes 12 can work at the same time on the data of a given table. If a request is for data in a single row, i.e., a prime index request, the IFP node 12 transmits it to the AMP node 12 in which the data resides. If the request is for multiple rows, then the steps are forwarded to all participating AMP nodes 12. Since the database tables are evenly distributed across the DSUs 16 of the AMP nodes 12, the workload of performing the SQL query is balanced between the AMP nodes 12 and DSUs 16.
>
> Block 24 also represents a dispatcher task executed by the IFP node 12 sending the step messages to their assigned AMP nodes 12 via the interconnect network 14. Block 26 represents the AMP nodes 12 performing the required data manipulation associated with the step messages received from the IFP node 12, and then transmitting appropriate responses back over the interconnect network 14 to the IFP node 12. Block 28 represents the IFP node 12 then merging the responses that come from the AMP nodes 12. Block 30 represents the output or result table being transmitted from the IFP node 12 to the users.

Pederson, 4:25-57 (emphasis added). The above description refers to the flow chart of figure 2, showing steps in the interpretation and execution of SQL statements. *See* Pederson, 4:14-15. The bolded text in the above-cited passage refers to the splitting of the query detailed in block 24 of Figure 2, which is presented below:

FIG. 2



Pederson, Fig. 2. Block 24 is what the Office Action is purportedly analogizing to the claimed "generating a set of SQL statements" feature of claim 116. *See* Office Action, pp.2-3. This analogy does not hold because block 24 in Pederson generates SQL sub-queries that are themselves join operations. Pederson's method performs a star join operation on a base table and a plurality of dimension tables – this is what is input into block 18. Then, "[t]he query is split into a plurality of sub-queries, wherein each of the sub-queries comprises a hash star **join operation** on the temporary dimension tables and one or more of the distinct sub-portions of the base table." (Emphasis added). Pederson, Abstract. This is to say that the query splitting done at block 24 produces sub-queries that comprise join operations. Claim 116 operates in a squarely contrary manner. The generated set of SQL statements "comprises SQL statements other than a statement that joins the first and second tables." Thus, it cannot be said that disclosure of a method that generates SQL sub-queries comprising join operations teaches or suggests the generating of SQL statements that explicitly do not contain join operations.

Further, the join operation performed within the claimed method is the single join operation that is done on the result sets, after the first and second tables have been queried – no joins are performed on the first and second tables. This is to say that the claimed invention never subjects the claimed tables to a join operation. By contrast, Pederson's method executes join operations directly on the portions of the tables on which the method operates. *See* Pederson, 4:25-57. Thus, the claimed method operates in a manner that is clearly distinguished from that of Pederson, at least because of Pederson's use of a plurality of joins on its input tables. It therefore cannot be said that Pederson's method of performing join operations on its input tables teaches or suggests the claimed invention.

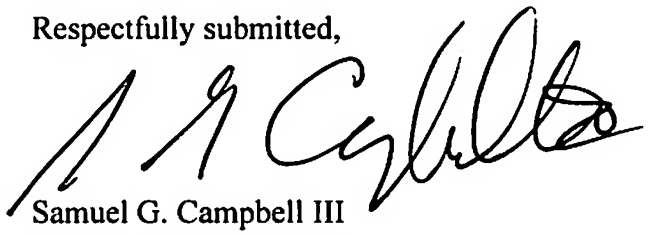
For at least these reasons, Applicants submit that Pederson does not provide disclosure of all the elements of independent claims 116, 128, 137, 146, and 155, and all dependent claims therefrom, and that these claims are in condition for allowance. Applicants therefore respectfully request the Examiner's reconsideration and withdrawal of the rejections to these claims and an indication of the allowability of same.

CONCLUSION

In view of the amendments and remarks set forth herein, the application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicants hereby petition for such extensions. Applicants also hereby authorize that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to Deposit Account 502306.

Respectfully submitted,



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